

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

1201 NORTH MARKET STREET  
P.O. BOX 1347  
WILMINGTON, DELAWARE 19899-1347

302 658 9200  
302 658 3989 FAX

**MEGAN E. DELLINGER**

(302) 351-9366

mdellinger@morrisnichols.com

August 8, 2024

The Honorable Colm F. Connolly  
J. Caleb Boggs Federal Building  
844 North King Street  
Room 4124, Unit 31  
Wilmington, DE 19801-3555

*VIA ELECTRONIC MAIL*

Re: *Pfizer Inc., et al. v. Apotex, Inc., et al.*;  
C.A. No. 24-621 (CFC)  
*Pfizer Inc., et al. v. Aurobindo Pharma Limited, et al.*;  
C.A. No. 24-622 (CFC)  
*Pfizer Inc., et al. v. Changzhou Pharmaceutical Factory*;  
C.A. No. 24-623 (CFC)  
*Pfizer Inc., et al. v. MSN Laboratories Private Ltd., et al.*;  
C.A. No. 24-624 (CFC)  
*Pfizer Inc., et al. v. Natco Pharma Ltd., et al.*; C.A. No. 24-625 (CFC)  
*Pfizer Inc., et al. v. Rubicon Research Private Ltd.*;  
C.A. No. 24-626 (CFC)  
*Pfizer Inc., et al. v. Teva Pharmaceuticals, Inc.*;  
C.A. No. 24-627 (CFC)

Dear Chief Judge Connolly:

Plaintiffs write in response to the Court's July 8, 2024 Order (D.I. 20 in CA. No. 24-621), regarding the need for coordinated discovery and/or Markman proceedings. Plaintiffs submit that these cases should be consolidated for all purposes, including discovery, any Markman proceedings, and trial. Counsel for the defendants have informed us that they do not oppose consolidation of these cases for all purposes. Plaintiffs believe that a joint scheduling conference would be most efficiently conducted after October 1. We have sent a proposed scheduling order to

The Honorable Colm F. Connolly  
August 8, 2024  
Page 2

the defendants for review and expect to be able to submit such an order in advance of a scheduling conference in October.

We are available should the Court have any questions regarding this matter.

Respectfully,

*/s/ Megan E. Dellinger*

Megan E. Dellinger (#5739)

MED/bac